



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

01-0056

SDMS # 201043

October 20, 2003

Mr. Andrew T. Silfer  
Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Ave. Via Electric and U.S. Mail  
Pittsfield, MA 01201

**Re: Conditional Approval of General Electric's July 1, 2003 *Sampling Summary Letter Report for the Group 2, Floodplain Properties Adjacent to the 1½-Mile Reach of the Housatonic River*, General Electric/Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval for the pre-design investigation activities conducted at the *Group 2 Properties* described in the above-referenced *Sampling Summary Letter Report for the Group 2, Floodplain Properties Adjacent to the 1½-Mile Reach of the Housatonic River*, (Report). The Report is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2002.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal subject to the conditions presented in this letter. The General Electric Company (GE) shall address the following conditions in either (i) a Pre-Design Investigation Report for Group 2 Properties or, (ii) if GE concludes that no response actions are necessary, in a combined Pre-Design Investigation Report/PCB Soil Evaluation Report and Conceptual Remedial Design/Remedial Action Work Plan for the Group 2 Properties (consistent with the previous Phase 1 properties submittal). GE shall submit either the Pre-Design Investigation Report or the combined Pre-Design Investigation Report/Conceptual RD/RA Work plan by January 15, 2004.

General Comments

1. A review of GE's data tables indicated six locations where PCB concentrations exceeded or equaled 2.0 ppm in the top foot of soil: 2-SS-7, 4.0 [3.2] ppm; 2-SS-8, 35 ppm; 2-SS-12, 50 ppm; 2-SB-3, 6.1 ppm; 2-SB-5, 2.33 ppm; and 2-SB-16, 2.0 ppm. A review of GE's data tables indicated four locations where PCB

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concentrations exceeded 2.0 ppm in the 1- to x-foot (ft) depth increments: 2-SB-1, 1- to 3-ft below ground surface (bgs), 5.4 ppm; 2-SB-5, 1- to 3-ft bgs, 2.28 [1.79] ppm; 2-SB-7, 3- to 6-ft bgs, 3.7 ppm; and 2-SB-10, 3- to 6-ft bgs, 4.4 ppm. For the Group 2 residential properties, GE must calculate the spatial average PCB concentrations for the 0- to 1-foot and 1- to x-foot increment utilizing existing PCB data currently available from GE's and EPA's project database. Based on an evaluation of the available soil PCB data, GE shall determine if the existing PCB concentrations in soil at each Group 2 property meet the applicable PCB Performance Standards and if the need exists for future response actions to address any PCB contamination at these properties.

2. Based on preliminary results, EPA concurs with GE's evaluation that non-PCB Appendix IX +3 constituents are not a concern and do not warrant further investigation. GE shall reevaluate this conclusion based after the data quality assessment of the data.

### **Specific Comments**

#### **Parcel I8-4-101**

Although a removal action was performed at this parcel, PCB concentrations between ~2 ppm and ~91 ppm remain at depth intervals below the soil removal depths for the Short Term Measures that were performed. At the 12 previous sample locations on the property, PCBs were detected in the 1- to 2.5-ft depth intervals, with no deeper sampling conducted at any of these locations. As a condition of the EPA's April 24, 2003, conditional approval letter, GE was to characterize PCB concentrations below 2.5 feet. In order to accomplish this condition, GE was to advance a soil boring, 2-SB-12 at the previous subsurface sample location I8-4-1-7. The collection of samples from 1- to x-feet at this location would satisfy the SOW requirement.

GE was unable to obtain access to sample this parcel from the current property owner. GE shall utilize the existing data to calculate spatial average PCB concentrations for the 0- to 1-foot and 1- to x-ft depth intervals. Based on an evaluation of the available soil PCB data, GE shall determine if the existing PCB concentrations in soil at this property meet the applicable PCB Performance Standards and if the need exists for future response actions to address PCB contamination at this property.

#### **Parcels I8-4-201 & I8-4-202**

PCB concentrations exceeded 25 ppm at the 0- to 1-ft depth intervals at two locations along the eastern boundary of the property: 2-SS-8, 35 ppm and 2-SS-12, 50 ppm. GE stated that these two samples are "...located on or very near the riverbank and will likely be addressed by EPA, at least in part, as part of its future actions related to the bank soils in the 1 ½-Mile Reach of the river." Figure 1, attached to this letter, depicts the proposed EPA limits of excavation for the riverbank in this section of the river. Weston will be

providing Blasland, Bouck, & Lee an electronic version (AutoCAD) of this figure for potential use in performing spatial averaging of PCB concentrations and evaluating the need for potential removal actions in relation to EPA's proposed limits of riverbank remediation.

The EPA reserves its right to perform additional sampling in the Group 2 Properties and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski  
GE Facility Project Manager

cc: Richard Gates, GE  
James Nuss, BBL  
James Bieke, Shea & Gardner  
Susan Steenstrup, MEDP  
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